

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

MARSHALL TAYLOR,

Plaintiff,

v.

CHIEF ALFORD WADSWORTH,

Defendant.

2:05-cv-745-A

MARSHALL TAYLOR,

Plaintiff,

v.

CHIEF ALFORD WADSWORTH

Defendant.

2:05-cv-800-T

**INTERROGATORIES TO PLAINTIFF MARSHALL TAYLOR**

COMES NOW Defendant Chief Alfred Wadsworth, by and through counsel, and propounds the following Interrogatories to Plaintiff Marshall Taylor to be answered under oath in accordance with the *Federal Rules of Civil Procedure*.

1. State the following identifying information:
  - a. Your full legal name,
  - b. Any other names that you currently use, or any other names that you

have used in the past (including your maiden name),

- c. Your date and place of birth,
- d. Your social security number,
- e. Your current residence address and mailing address,
- f. The name of your spouse, and
- g. Your educational background.

2. For each employer that you have had within the past ten (10) years from the present date, state the following:

- a. Name, address, and telephone number;
- b. Your job title and duties;
- c. Your rate of pay or salary;
- d. The dates of each employment; and
- e. Your reason for leaving each employment.

3. For each doctor, hospital, or medical care provider that has treated you or examined you for any reason in the last fifteen (15) years, state the following:

- a. Name, address, and telephone number;
- b. The reason for treatment; and
- c. The dates of treatment.

4. Describe in detail each and every bodily injury, illness, and psychological/emotional injury that you contend that you sustained as a result of the incident(s) made the basis of this lawsuit, and for each, state it's current status and prognosis. *(Note that this interrogatory, as are all others herein, is deemed continuing in nature, so as to request any updates or changes in status or prognosis throughout this litigation.)*

5. State the following for the mental anguish/emotional distress claimed in your Complaint:

- a. The nature of the mental anguish/emotional distress you have suffered and/or continue to suffer;
- b. The date when said mental anguish/emotional distress first manifested itself;
- c. The date when said mental anguish/emotional distress last manifested itself;
- d. All physical symptoms you claim to have suffered as a result of said mental anguish/emotional distress;
- e. Names, addresses, and telephone numbers of all medical doctors, psychologists, therapists, counselors, mental health providers, or clinics who have provided you treatment, therapy, or counseling for said mental anguish or emotional distress; and
- f. The direct cause of your claimed mental anguish/emotional distress.

6. Prior to suffering the mental anguish/emotional distress discussed in Interrogatory 5, state whether you have ever received treatment, therapy, or counseling for any emotional problem, mental health condition, nervous disorder, depression, neurosis, psychosis, alcohol abuse, or drug abuse. If yes, state the following:

- a. The nature of the problem and its current status;

- b. Dates of treatment; and
- c. The names, addresses, and telephone numbers of all medical doctors, psychologists, therapists, counselors, mental health providers, or clinics who have provided you treatment, therapy, or counseling for said condition.

7. Are you making a claim for lost income as a result of the incident(s) made the basis of this lawsuit? If yes, state the following:

- a. The name, address, and telephone number of your employer at the time of the incident(s);
- b. Your rate of pay at the time of the incident(s), including bonuses and commission;
- c. The amount of time you missed from work as a result of the incident(s);
- d. Whether or not you expect that you will miss time from work in the future, and if so, state how much time;
- e. The amount of past income lost (fully describe the method of computation, along with all facts assumed in the computation); and
- f. The amount of any future income you claim that you will lose (fully describe the method of computation, along with all facts assumed in the computation).

8. State in detail your version of the incident(s) made the basis of this lawsuit and all facts that you contend prove your allegations against this Defendant.

9. List all monetary damages that you claim to be owed to you by this Defendant as a result of the incident(s) made the basis of this lawsuit.

10. State the name, address, and telephone number of each person having knowledge of the facts, details, or information of the matter(s) complained of in this case. *(NOTE: This interrogatory is not asking for your witness list but seeks information that must be provided within thirty days in accordance with the Alabama Rules of Civil Procedure.)*

11. State the name, address, and telephone number of each and every witness that you intend to call to testify at the trial of this case.

12. For each expert that you have consulted, retained, or that you intend to have testify at trial, state the following:

- a. Name, address, and telephone number;
- b. Subject matter to which each expert is expected to testify;
- c. Substance of the facts and opinions on which the expert is expected to testify; and,
- d. A list of all cases in which the expert has given expert opinions or testimony, identify the name and address of the attorney who employed the expert, and the style of the case.

13. State if you have ever been arrested or convicted (found guilty, adjudicated guilty, pled no contest, and/or pled guilty) for any violation, misdemeanor, or felony criminal offense. If yes, state the following:

- a. The offense;
- b. The name under which you were arrested and/or convicted;
- c. Date of conviction or dismissal;
- d. Name and location of the court;

- e. Sentence imposed; and
- f. Date of sentence completion.

14. State whether you have ever been involved in any lawsuits including collection actions or bankruptcies in the ten years prior to this date. If yes, list all lawsuits filed by, or against you, setting forth:

- a. The style of the case;
- b. The Court where the matter was tried or is pending;
- c. The case number assigned to the case;
- d. The present status or resolution of the case; and,
- e. The type of case.

15. State the name, address, and telephone number of each person or entity to whom you have given a statement, written, recorded, or otherwise, or with whom you have discussed the facts of this case and/or any injuries you claim to have suffered arising from the incident(s) made the basis of this suit.

16. State the name, address, and telephone number of any insurance company and/or other entity or person who has paid you, or has paid on your behalf, or is obligated to pay, any money for injuries received or costs incurred by you as a result of any bodily injury or property damage you claim as a result of the incident(s) made the basis of this lawsuit, and for each, state:

- a. Policy and claim number;
- b. The amount paid or obligated to be paid;
- c. The amount claimed in subrogation or repayment; and

- d. Whether subrogation or repayment has been waived.

17. For each of your relatives, within the ninth degree of consanguinity or the fifth degree of affinity, who are at least 18 years of age and reside in the area covered by the United States District Court for the Middle District of Alabama, Northern Division (Autauga, Barbour, Bullock, Butler, Chilton, Coosa, Covington, Crenshaw, Elmore, Lowndes, Montgomery, and Pike Counties) in which this lawsuit is pending, state the following:

- a. Full name, and relationship to the Plaintiff;
- b. Date of birth;
- c. Residence address;
- d. Place of employment, and
- e. Spouse's name.

18. For each Prattville Police Department officer that you claim illegally entered your home and harassed you, state the following:

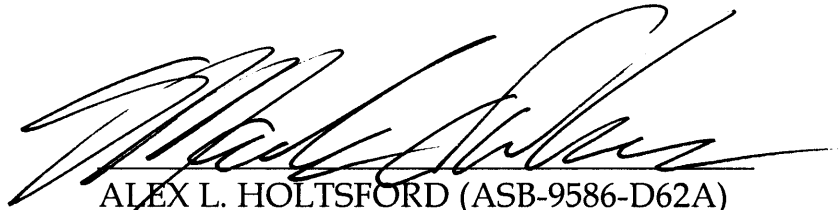
- a. Officer's name, sex, race, and age;
- b. The date(s) and time(s) that you claim said officer harassed you;
- c. Describe in detail every specific act by the officer that you claim to have been harassment; and,
- d. The location (address) of each claimed incident of harassment.

19. For each evil spirit that has harassed you in the incident(s) made the basis of this lawsuit state the following:

- a. The evil spirit's name, sex, race, and age;

- b. The evil spirit's physical description;
- c. Description of any clothing, jewelry, or other items worn by said evil spirit during the incident(s) complained of;
- d. Describe in detail each specific act by the evil spirit that you claim to have been harassment; and,
- e. The residence and/or business address of said evil spirits.

20. State the name and current address and telephone numbers of all persons residing at 229 Lewis Street, Prattville, Alabama at the time of the incident(s) made the basis of your lawsuit.



ALEX L. HOLTSFORD (ASB-9586-D62A)

S. MARK DUKES (ASB-9697-U77S)

Counsel for Defendant Alfred Wadsworth

OF COUNSEL:

*Nix, Holtsford, Gilliland, Higgins & Hitson, P.C.*

P.O. Box 4128

Montgomery, AL 36103-4128

334-215-8585 - Phone

334-215-7101 - Facsimile




**CERTIFICATE OF SERVICE**

I hereby certify that I have this day mailed, postage prepaid, an exact copy of the foregoing document to

Mr. Marshall Taylor  
229 Lewis Street  
Prattville, AL 36067

on this the 21<sup>st</sup> day of November 2005.

  
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OF COUNSEL